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Attorneys for Defendants, COUNTY OF LOS ANGELES, BLAKE RUNGE and
BRENDA ALCANTARA

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT COURT OF CALIFORNIA, WESTERN DIVISION

URSULA BYRAM, S.B. by and
through guardian ad litem TIMOTHY
BYRAM, N.B. by and through guardian
ad litem TIMOTHY BYRAM, and A.B.
by and through guardian ad litem
KAITLYN HUMENCHUK,
individually and as successors-in-
interest to Everett Byram,

Plaintiffs,

v.

COUNTY OF LOS ANGELES,
BLAKE RUNGE, and BRENDA

Case No.: 2:23-cv-09285-KS

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

**JOINT [PROPOSED] VERDICT
FORMS**

FPTC: January 21, 2025
Trial: February 10, 2025

1 ALCANTARA,

2 Defendants.

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4 **PLEASE TAKE NOTICE** that the Parties hereby submit their [Proposed]
5 Verdict Form for the Trial of this matter. Despite multiple meet and confers, they were
6 unable to reach an agreement but continue to work together to do so.

7
8 Respectfully submitted,

9 DATED: December 10, 2024 LAW OFFICES OF DALE K. GALIPO

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12 By: /s/ Cooper Alison-Mayne
13 DALE K. GALIPO
14 COOPER ALISON-MAYNE
15 Attorneys for Plaintiffs

16 DATED: December 10, 2024 HURRELL CANTRALL LLP

17
18
19 By: /s/ Jordan S. Stern
20 THOMAS C. HURRELL
21 JORDAN S. STERN
22 NICOLE G. ORTEGA
23 Attorneys for Defendants, COUNTY OF
24 LOS ANGELES, BLAKE RUNGE and
25 BRENDA ALCANTARA
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PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM

We the jury in the above-entitled case find as follows:

EXCESSIVE FORCE AND BATTERY CLAIM

QUESTION 1: Did Blake Runge use excessive or unreasonable force against Everett Byram?

_____ YES _____ NO

If you answered "Yes" to Question 1, please answer Question 2.

If you answered "No" to Question 1, please proceed to Question 3.

QUESTION 2: Was Blake Runge's the use of excessive or unreasonable force a cause of harm, damage, injury, loss, or death to Everett Byram's?

_____ YES _____ NO

Please proceed to the next Question.

FOURTEENTH AMENDMENT CLAIM

QUESTION 3: Did Blake Runge interfere with Plaintiff Ursula Byram, S.B., N.B., and A.B.'s familial relationships with Everett Byram?

_____ YES _____ NO

Please proceed to the next Question.

UNLAWFUL DETENTION CLAIM

QUESTION 4: Did Brenda Alcantara unreasonably detain Ursula Byram?

_____ YES _____ NO

If you answered "Yes" to Question 4, please answer Question 5.

If you answered "No" to Question 4, please proceed to Question 6.

QUESTION 5: Was the unreasonable detention a cause of harm to Ursula Byram?

_____ YES _____ NO

Please proceed to Question 6.

UNCONSTITUTIONAL CUSTOM OR POLICY CLAIM

QUESTION 6: Did Blake Runge act pursuant to an expressly adopted official policy or a widespread longstanding practice or custom of the County of Los Angeles?

_____ YES _____ NO

If you answered "Yes" to Question 6, please answer Question 7.

If you answered "No" to Question 6, please proceed to Question 8.

QUESTION 7: Was the County of Los Angeles' official policy or widespread or longstanding practice or custom a moving force behind the injury, damage, harm or death of Everett Byram?

_____ YES _____ NO

Please proceed to Question 8

FAILURE TO TRAIN CLAIM

QUESTION 8: Did the County of Los Angeles fail to properly train Blake Runge with respect to the use of deadly force?

_____ YES _____ NO

If you answered "Yes" to Question 8, please answer question 9.

If you answered "No" to Question 8, please proceed to question 11.

QUESTION 9: Was the County of Los Angeles deliberately indifferent to the known or obvious consequences of its failure to train Blake Runge?

_____ YES _____ NO

If you answered "Yes" to Question 9, please answer Question 10.

If you answered "No" to Question 9, please proceed to Question 11.

QUESTION 10: Was the County of Los Angeles' failure to train Blake Runge with respect to the use of deadly force a moving force behind the injury, damage, harm or death to Everett Byram?

_____ YES _____ NO

Please proceed to Question 11.

RATIFICATION CLAIM

QUESTION 11: Did a final policymaker for the County of Los Angeles make a deliberate choice to approve Blake Runge's acts and the bases for it?

_____ YES _____ NO

Please Proceed to Question 12.

AMERICANS WITH DISABILITIES ACT CLAIM

QUESTION 12: Did Everett Byram have a disability?

1 *If you answered “Yes” to Question 15, please proceed to Question 16.*

2 *If you answered “No” to Question 15, please proceed to Question 20.*

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5 **QUESTION 16:** Was Blake Runge’s negligence a cause of harm, damage, injury,
6 loss, or death to Everett Byram’s?

7
8 _____ YES _____ NO

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11 *If you answered “Yes” to Question 16, please proceed to Question 17.*

12 *If you answered “No” to Question 16, please proceed to Question 20.*

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14 **QUESTION 17:** Was Everett Byram negligent?

15
16 _____ YES _____ NO

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19 *If you answered “Yes” to Question 17, please answer Question 18.*

20 *If you answered “No” to Question 17, please proceed to Question 20.*

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22
23 **QUESTION 18:** Was Everett Byram’s negligence a cause of his harm, damage,
24 injury, loss, or death?

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26 _____ YES _____ NO

1 *If you answered “Yes” to Question 19, please answer Question 20.*

2 *If you answered “No” to Question 19, please proceed to Question 21.*

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QUESTION 19: What percentage of negligence that was a cause of Everett Byram's injury and/or death do you assign to Blake Runge, and what percentage of negligence that was a cause of Everett Byram's injury and/or death do you assign to Everett Byram, if any? (Your total should equal 100%).

Blake Runge _____ %

Everett Byram _____ %

Please proceed to the next Question.

BANE ACT CLAIM

QUESTION 20: Did Blake Runge violate the Bane Act by using force against Everett Byram?

_____ YES _____ NO

DAMAGES

Answer Question 10 only if you answered “Yes” to Questions 2, 7, 10, 11, 14, and/or 16.

QUESTION 25: What are Everett Byram’s damages for his pre-death pain and suffering?

\$_____

Answer Question 26 only if you answered “Yes” to 2, 7, 10, 11, 14, and/or 16.

QUESTION 26: What are Everett Byram’s damages for his loss of life?

\$_____

Answer Question 27 only if you answered “Yes” to Questions 2, 3, 7, 10, 11, 14, 16, and/or 24.

QUESTION 27: What are Plaintiffs’ wrongful death damages for the loss of Everett Byram?

S.B. Past wrongful death damages \$_____

S.B. Future wrongful death damages \$_____

N.B. Past wrongful death damages \$_____

N.B. Future wrongful death damages \$_____

A.B. Past wrongful death damages \$_____

A.B. Future wrongful death damages \$_____

Ursula Byram Past wrongful death damages \$_____

Ursula Byram Future wrongful death damages \$_____

Answer Question 28 only if you answered “Yes” to Question 5.

QUESTION 28: What are Ursula Byram’s past and future economic and noneconomic loss, including physical pain/mental suffering?

Past noneconomic loss \$_____

Future noneconomic loss \$_____

Please proceed to the next question.

QUESTION 29: Do you find that any of the defendants acted with malice, oppression, or in reckless disregard for Everett Byram’s constitutional rights?

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Blake Runge	_____ YES	_____ NO
Brenda Alcantara	_____ YES	_____ NO

Please sign and return this verdict form.

Signed: _____ Dated: _____

Jury Foreperson

DEFENDANTS' PROPOSED SPECIAL VERDICT FORM

We the jury in the above-entitled case find as follows:

QUESTION 1: Did Blake Runge use excessive force against Everett Byram?

_____ YES _____ NO

If you answered "YES" to Question 1, please answer Question 2.

If you answered "NO" to Question 1, please proceed to Question 12.

QUESTION 2: Was the use of excessive force a cause of harm, damage, injury, loss, or death to Everett Byram?

_____ YES _____ NO

If you answered "YES" to Question 2, please answer Question 3.

If you answered "NO" to Question 2, please proceed to Question 12.

QUESTION 3: Did Blake Runge act pursuant to an expressly adopted official policy or a widespread longstanding practice or custom of the County of Los Angeles?

_____ YES _____ NO

If you answered "YES" to Question 3, please answer Question 4.

If you answered "NO" to Question 3, please proceed to Question 5.

QUESTION 4: Was the County of Los Angeles' official policy or widespread or longstanding practice or custom a moving force behind the injury, damage, harm or death of Everett Byram?

_____ YES _____ NO

Please proceed to Question 5.

QUESTION 5: Did the County of Los Angeles fail to properly train Blake Runge with respect to the use of deadly force?

_____ YES _____ NO

If you answered "Yes" to Question 5, please answer question 6.

If you answered "No" to Question 5, please proceed to question 8.

QUESTION 6: Was the County of Los Angeles deliberately indifferent to the known or obvious consequences of its failure to train Blake Runge?

_____ YES _____ NO

If you answered "Yes" to Question 6, please answer Question 7.

If you answered "No" to Question 6, please proceed to Question 8.

QUESTION 7: Was the County of Los Angeles' failure to train Blake Runge with respect to the use of deadly force a moving force behind the injury, damage, harm or death to Everett Byram?

_____ YES _____ NO

Please proceed to Question 8.

QUESTION 8: Did [name of final policymaker] have final policymaking authority from County of Los Angeles concerning the use of deadly force by Blake Runge?

_____ YES _____ NO

If you answered "Yes" to Question 8, please answer Question 9.

If you answered "No" to Question 8, please proceed to Question 10.

QUESTION 9: Did [name of final policymaker] make a deliberate choice to approve Blake Runge's use of deadly force and the basis for it?

_____ YES _____ NO

QUESTION 10: Did Blake Runge act with a purpose to harm when using force against Everett Byram?

_____ YES _____ NO

If you answered "YES" to Question 10, please answer Question 11.

If you answered "NO" to Question 10, please proceed to Question 12.

QUESTION 11: Did Blake Runge's use of force interfere with the familial relationship between S.B., N.B. and/or A.B. with Everett Byram?

_____ YES _____ NO

Please proceed to the next Question 12.

QUESTION 12: Did Brenda Alcantara seize Ursula Byram's person?

_____ YES _____ NO

If you answered "YES" to Question 12, please answer Question 13.

If you answered "NO" to Question 12, please proceed to Question 15.

QUESTION 13: Did Brenda Alcantara unreasonably detain Ursula Byram?

_____ YES _____ NO

If you answered "YES" to Question 13, please answer Question 14.

If you answered "NO" to Question 13, please proceed to Question 15.

QUESTION 14: Did the unreasonable detention cause harm to Ursula Byram?

_____ YES _____ NO

Please proceed to Question 15.

1 **QUESTION 15:** Did Everett Byram have a disability?

2
3 _____ YES _____ NO

4
5 *If you answered "Yes" to Question 15, please answer Question 16.*

6 *If you answered "No" to Question 15, please proceed to question 18.*

7
8 **QUESTION 16:** Did the County of Los Angeles exclude Everett Byram from
9 participation in or deny Everett Byram the benefits of any service or program offered
10 by the County of Los Angeles?

11
12 _____ YES _____ NO

13
14 *If you answered "Yes" to Question 16, please answer Question 17.*

15 *If you answered "No" to Question 16, please proceed to Question 18.*

16
17 **QUESTION 17:** Was Everett Byram denied the benefits of the program or service
18 solely by reason of his disability?

19
20 _____ YES _____ NO

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22 *Please proceed to Question 18.*

23 **QUESTION 18:** Was Blake Runge negligent toward Everett Byram?

24
25 _____ YES _____ NO

26
27 *If you answered "Yes" to Question 18, please proceed to Question 19.*

28 *If you answered "No" to Question 18, please proceed to Question 23.*

QUESTION 19: Was Blake Runge’s negligence a cause of harm, damage, injury, loss, or death to Everett Byram’s?

_____ YES _____ NO

If you answered “Yes” to Question 19, please proceed to Question 20.

If you answered “No” to Question 19, please proceed to Question 23.

QUESTION 20: Was Everett Byram negligent?

_____ YES _____ NO

If you answered “Yes” to Question 20, please answer Question 21.

If you answered “No” to Question 20, please proceed to Question 22.

QUESTION 21: Was Everett Byram’s negligence a cause of his harm, damage, injury, loss, or death?

_____ YES _____ NO

If you answered “Yes” to Question 21, please answer Question 22.

If you answered “No” to Question 21, please proceed to Question 22.

QUESTION 22: What percentage of negligence that was a cause of Everett Byram's injury and/or death do you assign to Blake Runge, and what percentage of negligence that was a cause of Everett Byram's injury and/or death do you assign to Everett Byram? (Your total should equal 100%).

Blake Runge _____ %

Everett Byram _____ %

Please proceed to Question 23..

QUESTION 23: Did Blake Runge violate the Bane Act by using deadly force against Everett Byram?

_____ YES _____ NO

DAMAGES

Answer Question 24 only if you answered "Yes" to Questions 2, 4, 7, 9, 17, and/or 19.

QUESTION 24: What are Everett Byram's noneconomic damages?

\$ _____

Answer Question 25 only if you answered "Yes" to 2, 4, 7, 9, 17, and/or 19.

QUESTION 25: What are Ursula Byram's noneconomic damages for the loss of Everett Byram?

Ursula Byram's noneconomic damages \$_____

Answer Question 25 only if you answered "Yes" to Question 11.

QUESTION 25: What are S.B., N.B. and A.B's damages as a result of the interference with their familial relationship with Everett Byram?

S.B.'s damages \$_____

N.B.'s damages \$_____

A.B.'s damages \$_____

Answer Question 26 only if you answered "Yes" to Question 14.

QUESTION 26: What are Ursula Byram's noneconomic damages as a result of the unlawful detainment?

Past noneconomic loss \$_____

Future noneconomic loss \$_____

Please proceed to question 28.

QUESTION 28: Do you find that any of the defendant deputies acted with malice, oppression, or in reckless disregard for Everett Byram's constitutional rights?

Blake Runge	_____ YES	_____ NO
Brenda Alcantara	_____ YES	_____ NO

Please sign and return this verdict form.

Signed: _____ Dated: _____

Jury Foreperson